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January 28, 2025

VIA ECF

Hon. Lorna G. Schofield
United States District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1106
New York, New York 10007

Re: Timothy Rodgers v. Mercy College et al., Case No. 1:23-cv-7278 (LGS)

Your Honor:

We represent Defendant Dr. Kristine Southard (“Dr. Southard”) in the above-referenced matter and submit this letter jointly with Plaintiff Timothy Rodgers (“Plaintiff”) and Defendants Mercy College, Dr. Jose Herrera, and Timothy Hall (together with Dr. Southard, “Defendants,” and with Dr. Southard and Plaintiff, the “Parties”) in response to the Court’s Order, dated January 24, 2025 (ECF No. 122).

The Parties attended a settlement conference on January 16, 2025 before Magistrate Judge Netburn (*see* ECF No. 113). The Parties engaged in good-faith negotiations but did not resolve any of their remaining claims, which are outlined in the Parties’ stipulation of partial dismissal which was so-ordered on January 15, 2025 (ECF No. 121).

Accordingly, the Parties have conferred and propose the following mutually agreeable briefing schedule for Defendants’ motions for summary judgment.

- Defendants’ motions for summary judgment to be filed before or on April 9, 2025;
- Plaintiff’s Opposition brief(s) to be filed before or on June 13, 2025;
- Defendants’ Reply briefs to be filed before or on July 11, 2025.

We appreciate Your Honor’s consideration of this request and remain available should the Court require additional information.

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Respectfully submitted,

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Cc: All Counsel of Record (via ECF)